

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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SCREEN ACTORS GUILD - AMERICAN	:	
FEDERATION OF TELEVISION AND RADIO	:	
ARTISTS, NEW YORK LOCAL	:	
	:	
Plaintiff,	:	Civil No. 21/4972
	:	
-v-	:	
	:	
NEW YORK PUBLIC RADIO	:	
	:	
Defendant.	:	
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EXHIBIT E TO COMPLAINT TO COMPEL ARBITRATION



May 5, 2021

VIA E-MAIL (MJefferson@nypublicradio.org)

Monique Jefferson
Chief Human Resources Officer
New York Public Radio
160 Varick Street, 7th Floor
New York, NY 10013

Subject: Grievance regarding WNYC's Failure to Abide by Grievance Procedure

Dear Ms. Jefferson,

I write to follow up on our grievance of March 2, 2021 and my email of March 11, 2021. Pursuant to Article XXI of the 2018-2022 SAG-AFTRA/WNYC collective bargaining agreement ("CBA"), please accept this letter as a written grievance of WNYC's failure to abide by the grievance procedure and its refusal to meet over disputes regarding the interpretation, application or claimed violations of this agreement. As you know, Article XXI of the CBA provides, "The term grievance shall mean any dispute arising out of (a) the interpretation, application or a claimed violation of this Agreement; (b) any personal services agreement between the Employer and an employee covered by this agreement; or (c) any appeal of a claimed wrongful disciplinary action." Further, Article XXI requires that after filing a grievance, "The Employer and the Union shall meet within ten (10) days of receipt of the grievance." Clearly, the parties have a dispute arising out of the interpretation of the CBA. In addition, we requested on several occasions to meet over this disagreement pursuant to the CBA. Regardless of WNYC's position regarding the underlying grievance it is not privileged to simply ignore its obligations under the CBA. WNYC's refusal to engage on a grievance and refuse to meet is a violation of the clear language of the grievance procedure and past practice regarding what constitutes a grievance under the CBA.

Please advise of your availability for a grievance meeting over this issue

Sincerely,

A handwritten signature in black ink, appearing to read "JM" or "Joshua Mendelsohn".

Joshua Mendelsohn

Senior Labor Counsel, News and Broadcast

Joshua Mendelsohn, Senior Labor Counsel, News and Broadcast
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